1   BELLSOUTH TELECOMMUNICATIONS, INC.

2   SURREBUTTAL TESTIMONY OF KENNETH L. AINSWORTH

3 BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

4   DOCKET NO. 2003-326-C

5   MARCH 31, 2004

6

7 Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR

8   POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC.

9   ("BELLSOUTH").

10

11 A. My name is Ken L. Ainsworth. My business address is 675 West Peachtree

12   Street, Atlanta, Georgia 30375. My title is Director – Interconnection Operations

13   for BellSouth.

14

15 Q. ARE YOU THE SAME KEN L. AINSWORTH WHO EARLIER FILED DIRECT

16   AND REBUTTAL TESTIMONY IN THIS DOCKET?

17

18 A. Yes.

19

20 Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY BEING

21   FILED TODAY?

22

23 A. I will respond to certain hot cut issues raised in the rebuttal testimonies of Mr.

24   James D. Webber and Ms. Sherry Lichtenberg on behalf of MCI, and Mr. Mark

25   David Van de Water on behalf of AT&T.

1   **The Hot Cut Process – General**

2

3   Q.   THE COMPETITIVE LOCAL EXCHANGE CARRIERS ("CLECS") HAVE

4   CRITICIZED BELLSOUTH FOR BEING UNWILLING TO COLLABORATE (*See*

5   Van de Water, at 8; Lichtenberg, at 10). IS THIS CRITICISM MERITORIOUS?

6

7   A.   No. BellSouth has always stated that it was willing to consider specific process

8   changes proposed by the CLECs. While the CLECs have chosen to make these

9   suggestions via this docket as opposed to through operational channels,

10   BellSouth has listened. In an effort to be responsive, BellSouth has agreed to

11   make the following enhancements to its effective and seamless batch hot cut

12   process:

13   • Batch process will be applicable to CLEC-to-CLEC migrations (UNE-P to

14   UNE-L);

15   • Batch process will be applicable to CLEC-to-CLEC migrations (UNE-L to

16   UNE-L) at such time as necessary systems changes can be made;

17   • Batch process will guarantee that an end user's account will all be cut on

18   the same day;

19   • Batch process will include after-hours and Saturday cuts;

20   • Batch process will guarantee a four-hour time window for coordinated hot

21   cuts;

22   • Batch process will include a timely throw-back process if requested by the

23   CLEC during the provisioning process;

24   • BellSouth will implement a web-based communication system for non-

25   coordinated hot cuts similar to that implemented by Verizon and SBC;

1 • BellSouth will reduce the 14-day provisioning interval in the batch process

2 to 8 days in systems release 16.0 currently scheduled for July of this year;

3 • BellSouth will implement a scheduling tool similar to SBC's;

4 • Batch process will include hot cuts to DS0 EELs.

5

6 These enhancements to BellSouth's already-compliant Batch Hot Cut Process

7 should address virtually all of the CLEC's alleged criticisms of the process.

8 Exhibit KLA-8, filed with my rebuttal testimony, is the UNE-P to UNE-L Bulk

9 Migration CLEC Information Package, which was updated and posted to the web

10 on February 18, 2004. It contains many of the enhancements I just mentioned.

11

12 Q. MS. LICHTENBERG ALLEGES, ON PAGE 10 OF HER TESTIMONY, THAT

13 "MCI WOULD PREFER A PROCESS THAT PROVIDES STANDARD DUE

14 DATES AND ALLOWS THE ISSUANCE OF INDIVIDUAL LSRs, BUT

15 BELLSOUTH CONTINUES TO REFUSE TO COLLABORATE WITH CLECS TO

16 DEVELOP A TRUE BATCH HOT CUT PROCESS." PLEASE COMMENT.

17

18 A. This testimony demonstrates that Ms. Lichtenberg does not know what she

19 wants. On the one hand, she criticizes BellSouth for failing to develop a true

20 "batch" process, but on the other hand argues that BellSouth must provide

21 standard due dates with individual LSRs, exactly what the individual hot cut

22 process provides. This type of contradiction, coupled with the fact that CLECs

23 have stated that they would not support *any* manual hot cut process, is the

24 reason BellSouth has declined to collaborate. The CLECs view collaboration as

25 a means by which to delay a switching impairment decision, not as a means by

1   which to improve the process.

2

3   However, as my testimony demonstrates, BellSouth is listening and considering

4   all inputs from CLECs and commissions in various workshops to enhance the

5   currently compliant process. BellSouth is incorporating these suggestions for

6   tools and additional processes into current processes when they are reasonable

7   and enhance the existing process.

8

9 Q. MR. VAN DE WATER, ON PAGE 2 OF HIS TESTIMONY, ARGUES THAT

10   BELLSOUTH HAS NOT COMPLIED WITH THE *Triennial Review Order* ("TRO")

11   BECAUSE IT HAS NOT ADOPTED A BATCH HOT CUT PROCESS. PLEASE

12   ADDRESS.

13

14 A. As with most of the CLEC testimony, AT&T is quick to call BellSouth's process

15   non-compliant, but slow to provide technically feasible alternatives. BellSouth

16   does not dispute that the provisioning portion of its Batch Hot Cut process is

17   identical to the individual process – the use of the provisioning process was

18   deliberate. BellSouth took a proven, tested and approved process and overlaid a

19   bulk ordering mechanism and project management to create a seamless, end-to-

20   end process that will allow BellSouth to efficiently migrate thousands of UNE-P

21   customers to UNE-L. There are ordering and provisioning efficiencies in the

22   batch process and thereby it complies with the TRO.

23

24

25

The Batch Hot Cut Process – Specifics

Hot Cuts for EELs

Q. ON PAGES 2 AND 6 OF HIS TESTIMONY, MR. WEBBER INDICATES THAT "NEITHER BELLSOUTH'S INDIVIDUAL HOT CUT PROCESS NOR ITS BATCH ORDERING PROCESS PERMIT CLECS TO TRANSFER RETAIL OR UNE-P LINES TO EELs" AND THAT "THE COMMISSION SHOULD REQUIRE BELLSOUTH TO ACCOMMODATE EELs IN ITS INDIVIDUAL HOT CUT PROCESS AND ITS BATCH PROCESS." PLEASE COMMENT.

A. Mr. Webber is partially correct. In direct testimony, I stated that BellSouth currently did not offer UNE-P transfers to EELs. However, BellSouth did support retail/resale transfers to EELs. I should clarify that the current retail/resale transfers were for DS1 service types and new UNE-P/resale DS0 service. As Mr. Webber indicated on pages 2 and 6 of his testimony, BellSouth currently does not provide migrations of existing UNE-P and DS0 retail loops to EELs. However, BellSouth has agreed to include hot cuts to DS0 EELs in its batch and individual hot cut processes. BellSouth's target implementation date is July 2004. Exhibit KLA-7, filed with my rebuttal testimony, is a draft of the Market Service Description for this process.

Q. FURTHER ON PAGE 7 OF HIS TESTIMONY, MR. WEBBER OPINES AS TO HOW BELLSOUTH'S PROCESSES AND REQUIREMENTS SHOULD BE CHANGED TO MAKE EELs USEFUL TO CLECS AND SUGGESTS THAT

5

1   DURING THE PROVISIONING PROCESS, "ALL ANI TESTING SHOULD BE

2   COMPLETED VIA THE DS0 EEL." DO YOU AGREE?

3

4 A. As I have indicated, the product team is developing the DS0 EEL process. It

5   would be premature for me to speculate on the connectivity process. However,

6   BellSouth does agree that appropriate hot cut pre-due and due date testing

7   would be part of the process. This would include the ANI testing at the

8   conversion location as described by Mr. Webber on page 7 of his testimony.

9

10   ***CLEC-to-CLEC Migrations***

11

12 Q. MS. LICHTENBERG, ON PAGE 7 OF HER TESTIMONY, IMPLIES THAT

13   BELLSOUTH DOES NOT ADDRESS CLEC-TO-CLEC MIGRATIONS. HAS MS.

14   LICHTENBERG IDENTIFIED ANY ISSUE IN A CLEC-TO-CLEC MIGRATION

15   THAT IS THE RESPONSIBILITY OF BELLSOUTH?

16

17 A. Absolutely not. As I stated in my rebuttal testimony, the issues about which Ms.

18   Lichtenberg complains are neither caused by BellSouth nor can they be resolved

19   by BellSouth. Ms. Litchenberg seems to suggest that BellSouth should be

20   penalized for lack of effective processes or execution between CLECs. I would

21   submit the opposite and ask that the Commission not support this argument

22   when Ms. Lichenberg admits that BellSouth is not directly involved in the process

23   issues she describes.

24

25 Q. FROM A PROVISIONING PERSPECTIVE, WILL BELLSOUTH PERFORM

1   CLEC-TO-CLEC MIGRATIONS?

2

3   A.   Absolutely. BellSouth's individual hot cut process has always included CLEC-to-

4   CLEC migrations. In response to CLEC concerns, BellSouth has agreed to add

5   CLEC-to-CLEC migrations (UNE-P to UNE-L) to the Batch Hot Cut Process, as

6   well as CLEC-to-CLEC migrations (UNE-L to UNE-L) as soon as necessary

7   systems changes can be made.

8

9   ***Web-based Scheduler***

10

11 Q.   MS. LICHTENBERG STATES, ON PAGE 8 OF HER TESTIMONY, THAT

12   BELLSOUTH'S BATCH HOT CUT PROCESS IS NOT ACCEPTABLE BECAUSE

13   IT "REQUIRES ADDITIONAL STEPS (A MANUAL SPREADSHEET,

14   NEGOTIATION FOR DUE DATES AND A NEW BULK LSR) TO THE

15   PROCESS." ON PAGE 10 OF HER TESTIMONY, SHE RECOMMENDS THAT

16   BELLSOUTH SHOULD IMPLEMENT "A SCHEDULING TOOL SUCH AS THE

17   ONE VERIZON IS DISCUSSING AND THAT SBC IS PROPOSING. PLEASE

18   RESPOND.

19

20 A.   BellSouth's spreadsheet process, particularly when coupled with project

21   management, is an effective means by which to manage large volumes of hot

22   cuts. As demonstrated by BellSouth's third party test, BellSouth follows its

23   process and the process works. Other than disagreeing with a manual process

24   generally, Ms. Lichtenberg has not pointed to any specific or documented flaws

25   in BellSouth's ordering process and, in fact, was involved in the development of

1		the ordering portion of the batch hot cut process as BellSouth witness Mr. Pate
2		describes.
3		
4		In an effort to be responsive to CLEC concerns, however unfounded they may
5		be, BellSouth has agreed to implement a mechanized, web-based scheduler for
6		batch ordering to further enhance the mechanized batch ordering process.
7		BellSouth is targeting the release of this functionality for October 2004. Exhibit
8		KLA-6, filed with my rebuttal testimony, outlines specific details of this web-based
9		application.
10		
11		***Same-day Cuts for End User Accounts***
12		
13	Q.	ON PAGE 9 OF HER TESTIMONY, MS. LICHTENBERG CRITICIZES THE
14		BATCH PROCESS FOR NOT GUARANTEEING AN END USER'S LINES WILL
15		BE CUT ON THE SAME DAY. PLEASE RESPOND.
16		
17	A.	BellSouth will guarantee that all the lines in an end user's account will be cut on
18		the same day. This should alleviate Ms. Lichtenberg's concern.
19		
20		***Interval Reduction***
21		
22	Q.	MS. LICHTENBERG, ON PAGE 10 OF HER TESTIMONY, STATES "THE
23		FOUR BUSINESS DAYS BELLSOUTH REQUIRES FOR INITIAL
24		NEGOTIATION IS FAR TOO LONG; THE ENTIRE PROCESS FROM START
25		TO FINISH SHOULD TAKE FIVE BUSINESS DAYS." DO YOU AGREE?

1   A.   If Ms. Lichtenberg is suggesting the entire processing interval for batch

2   migrations should only require five (5) business days for processing transfers of

3   possibly hundreds of lines, then I adamantly disagree. The planning, pre-due

4   preparation (wiring), quality checks (ANAC), and due date work activity are

5   functions directly related with the ability to match force to load. Handling mass

6   volumes requires appropriate planning and appropriate intervals to effectuate a

7   seamless migration. Five (5) business days is insufficient time to complete that

8   process.

9

10   That being said, if Ms. Lichtenberg is referring specifically to the period of time in

11   which BellSouth reviews the spreadsheet, BellSouth has reduced that interval

12   from seven (7) days to four (4) days as part of a batch interval reduction effort.

13   This change was effective on February 18, 2004.

14

15   In addition, BellSouth, in conjunction with other planned enhancements, will

16   reduce the 14-business day provisioning interval to eight (8) days. This change

17   is currently scheduled to take place in systems release 16.0 in July of this year.

18

19   ***Mechanized Communication Tool***

20

21   Q.   MS. LICHTENBERG COMPLAINS, ON PAGE 10 OF HER TESTIMONY, THAT

22   BELLSOUTH NEEDS A COMMUNICATION TOOL SIMILAR TO THE VERIZON

23   WPTS. PLEASE RESPOND.

24

25   A.   BellSouth will provide a web-based notification tool for non-coordinated batch

1   conversions. BellSouth will make this tool available to CLECs by June 2004.

2   Exhibit KLA-5, filed with my rebuttal testimony, provides specific details and

3   sample screen prints of information to be contained in the web-based system.

4

5   ***SBC's Process***

6

7 Q.   ON PAGES 8-9 OF HIS TESTIMONY, MR. VAN DE WATER DISCUSSES

8   SBC'S PROCESS. WHAT IS YOUR ANALYSIS OF SBC'S PROCESS?

9

10 A.   I have reviewed the SBC **proposed** batch processes and will address each of

11   the bullet items in Mr. Van De Water's testimony below.

12   • Flexible scheduling—BellSouth has agreed to include after-hours and

13   Saturday cuts in the batch process.

14   • Eliminates negotiation steps and time involved—BellSouth's current batch

15   hot cut process involves very little negotiation with the CLEC. There is

16   some internal negotiation that occurs to establish due dates. As stated

17   previously, BellSouth also has agreed to implement a scheduling tool to

18   allow CLECs to select batch migration due dates thus reducing negotiation

19   steps and manual interface time.

20   • Provides defined interval to allow for CLEC resource planning –

21   BellSouth's current batch hot cut process allows for CLEC resource

22   planning. The CLECs have the ability to request a desired due date when

23   they submit their batch request. If the requested due date does not

24   represent an interval shorter than the minimum, BellSouth will honor that

25   date as long as workload and personnel will allow. Regardless of whether

10

1   the CLEC requests a due date, BellSouth supplies the due date when the

2   project notification sheet is returned to the CLEC. This should allow the

3   CLEC sufficient time for resource planning. As stated previously,

4   BellSouth also is implementing a scheduling tool to allow the CLECs to

5   select batch migration due dates prior to submitting their batch request.

6   • Provides CLECs an ability to reserve time—As stated above, under the

7   current Batch process the BellSouth Customer Care Project Manger will

8   work with the CLEC if they need a coordinated order worked within a

9   window of time. Moreover, in an effort to be responsive, BellSouth has

10   agreed to (1) commit to a four-hour time window for coordinated hot cuts;

11   and (2) develop a scheduling tool to allow the CLEC to request time

12   frames for coordinated orders.

13   • Wire center based to provide CLEC the ability to convert multiple central

14   offices on the same day—BellSouth's current process also allows the

15   ability to convert multiple offices on the same day.

16   • Includes requests involving IDLC cuts—BellSouth's current process

17   includes requests involving IDLC cuts.

18   • Mechanized order flow—BellSouth's batch hot cut orders will flow through

19   at the same rate as individual orders of the same type. In addition to this,

20   BellSouth current batch process allows for the submission of a single bulk

21   LSR for up to 99 end user accounts where SBC's proposed process

22   requires single LSR submissions for each account.

23   • Reservation tool—In BellSouth's current process, the Customer Care

24   Project Manger performs this function for the CLEC. Again, BellSouth's

25   scheduler tool, which it has agreed to implement, will allow due date

1   reservations.

2   • Pre-order IDLC tool—BellSouth's current process also provides this

3   function through the use of its Loop Makeup Tool. The CLEC can query to

4   see what type of facility is currently on the end user's line and reserve an

5   alternate facility, if available, if the line is on IDLC.

6

7   *Window Of Time For Cuts*

8

9   Q.   MR. VAN DE WATER, ON PAGE 10 OF HIS TESTIMONY, SAYS THAT

10   BELLSOUTH WILL NOT COMMIT TO TIME SPECIFIC HOT CUTS, OR EVEN A

11   WINDOW, IN THE BATCH PROCESS. PLEASE COMMENT.

12

13   A.   As I discussed earlier, BellSouth has enhanced the batch process to guarantee a

14   four (4) hour time window for coordinated cuts in the batch process. This should

15   alleviate Mr. Van de Water's concern.

16

17   *After-Hours/Weekend Cuts*

18

19   Q.   ON PAGE 11 OF HIS TESTIMONY, MR. VAN DE WATER STATES THAT

20   BELLSOUTH WILL NOT DO AFTER-HOURS HOT CUTS OR SCHEDULE HOT

21   CUTS ON WEEKENDS TO AVOID END USER DISRUPTION. IS HE

22   CORRECT?

23

24   A.   No. As I previously stated, BellSouth will include after hours and Saturday cuts

25   in the batch process.

1		*Retail-UNE-L Conversions*
2		
3	Q.	ON PAGE 15 OF MR. VAN DE WATER'S TESTIMONY, HE CRITICIZES
4		BELLSOUTH'S BATCH HOT CUT PROCESS BECAUSE IT DOES NOT APPLY
5		TO RETAIL TO UNE-L CONVERSIONS. PLEASE COMMENT.
6		
7	A.	The purpose of the batch migration process is to move large numbers of loops
8		from one carrier's local switch to another carrier's local switch. Thus, the process
9		is particularly suited to the conversion of an embedded base of customers.
10		Customer acquisition, on the other hand, does not lend itself to batch
11		conversions. CLECs do not structure their marketing plans or their sales
12		channels to target a single wire center per day. On the contrary, CLECs are
13		winning customers statewide in whatever order they sign up. It would make no
14		sense for a CLEC to forego the revenue associated with customer acquisition
15		while it accumulated sufficient customers in a wire center to make use of the
16		batch process meaningful. BellSouth has a Commission-approved individual hot
17		cut process that should be utilized for customer acquisition.
18		
19		**Scalability Of The Batch Hot Cut Process**
20		
21	Q.	MS. LICHTENBERG, ON PAGE 3 OF HER TESTIMONY, ALLEGES THAT
22		BELLSOUTH'S SCALABILITY ARGUMENTS ARE NO MORE THAN "FUTURE"
23		PROMISES. DO YOU AGREE?
24		
25	A.	No, I do not agree. BellSouth has a proven track record of staffing its centers

1 and network forces to accommodate changing and increasing loads. Ms.

2 Lichtenberg has pointed to no evidence to support her claim that BellSouth's

3 process is not scalable. The Commission, therefore, should disregard her

4 testimony on this point.

5

6 Q. ON PAGE 6 OF HER TESTIMONY, REGARDING THE IMPACT OF

7 INCREASED MANUAL ORDER PROCESSING REQUIRED FOR UNE-L

8 ORDERS, MS. LICHTENBERG ALLEGES THAT BELLSOUTH'S FORCE

9 MODEL "FAILS TO ADDRESS THE FUNDAMENTAL QUESTION OF

10 WHETHER SIMPLY STAFFING UP CAN ADDRESS THE PROBLEM." PLEASE

11 COMMENT.

12

13 A. Ms. Lichtenberg is incorrect. BellSouth's force model does account for different

14 fallout rates. The increased number of BellSouth Service Representatives that I

15 included in my direct testimony included personnel to handle an increased

16 number of manual orders.

17

18 Q. ON PAGE 16 OF HIS TESTIMONY, MR. VAN DE WATER CRITICIZES

19 BELLSOUTH FOR "THROWING BODIES" AT THE HOT CUT PROBLEM

20 RATHER THAN PROPOSING ANY MECHANIZATION OF THE PROCESS.

21 PLEASE COMMENT.

22

23 A. First, BellSouth does not believe it has a hot cut "problem." Rather, it has an

24 efficient and seamless process by which it can move loops from one carrier's

25 switch to another carrier's switch. Second, BellSouth is not "throwing bodies" at

1		the problem. Rather, it will staff its network forces to handle the hot cuts that
2		arise. Whether AT&T likes it or not, it takes human beings to run a telephone
3		company. Finally, BellSouth agrees that it has not taken steps to institute the
4		eight (8) billion dollar retrofit of its network that AT&T advocates. Such a capital
5		expenditure cannot be justified, particularly when BellSouth has an efficient hot
6		cut process in place.
7		
8	Q.	ON PAGE 21 OF HIS TESTIMONY, MR. VAN DE WATER ARGUES THAT
9		BELLSOUTH'S CUTOVER OF OVER 260 LINES IN A SINGLE CENTRAL
10		OFFICE IN ONE DAY DOES NOT DEMONSTRATE BELLSOUTH'S ABILITY TO
11		PERFORM HOT CUTS AT FORESEEABLE VOLUMES. PLEASE COMMENT.
12		
13	A.	To the contrary, this single day shows BellSouth's ability to successfully complete
14		high volumes of orders within a single office, both central office and IDLC, while
15		sustaining significant volumes in several other offices. On the date referenced by
16		Mr. Van de Water, BellSouth converted 98% of 440 orders scheduled for
17		conversion. Approximately 50% of the orders on this day were IDLC
18		conversions. On the same day, highest single office performance was 97.5%,
19		provisioning 201 of the 206 orders due. Through the date of this filing, BellSouth
20		has consistently maintained a successful due date completion rate average of
21		over 98% for UNE-P to UNE-L migrations with total UNE-P to UNE-L migration
22		volumes as high as 1,000 per day total and in single offices of over 350 per day.
23		Month over month, UNE-P to UNE-L volumes have risen significantly with totals
24		of over 1900 in November 2003; over 3100 in December 2003; over 5400 in
25		January 2004; and over 6600 in February 2004. During the months of November

15

1   and December 2003, Missed Installation Appointments for the CLEC aggregate

2   was 1.27% for November and 1.54% for December as compared to the

3   BellSouth retail rates of 1.75% and 1.90%, respectively.

4

5   Bellsouth has maintained these high due date performance rates with virtually no

6   advance planning. Given the fact that CLECs have the ability to use the batch

7   migration process, which allows both the CLEC and BellSouth extended intervals

8   for planning, it obviously follows that BellSouth's ability to perform hot cuts in

9   large quantities would only improve, given some idea of 'foreseeable' volumes

10   from the CLECs.

11

12   Exhibit KLA-10 sets forth BellSouth's UNE-P to UNE-L hot cut performance for

13   October 9, 2003 – January 31, 2004.

14

15   Q.   ON PAGE 22 OF HIS TESTIMONY, MR. VAN DE WATER STATES THAT

16   BELLSOUTH'S ASSUMPTION REGARDING NON-COORDINATED HOT CUTS

17   IN ITS FORCE MODEL IS INCORRECT. PLEASE COMMENT.

18

19   A.   There is no real way to be certain which option, coordinated or non coordinated,

20   CLECs will choose to convert their UNE-Ps. BellSouth assumed that at least half

21   of the migrations will be non-coordinated. To date, the vast majority, if not all,

22   migrations of UNE-P to UNE-L have been non-coordinated. BellSouth does not

23   expect that future migrations will differ very much from this. Moreover, MCI

24   representatives, in a hot cut workshop in Tennessee, advised that they expected

25   to use non-coordinated conversions. Further, based on the fact that a high

1 percentage of UNE-P end users are residential, BellSouth expects the non-

2 coordinated option to be used based simply on economics. If BellSouth's

3 assumptions prove to be incorrect, BellSouth's force model can, and will, be

4 adjusted.

5

6 Q. MR. VAN DE WATER, ON PAGE 23 OF HIS TESTIMONY, IMPLIES THAT

7 BELLSOUTH INCORRECTLY ASSUMES A BALANCED LOAD OF

8 MIGRATIONS WHEN THE REALITY IS THAT THE CONVERSIONS MAY BE

9 "BACKLOADED" AT THE END OF THE SCHEDULE. DO YOU AGREE?

10

11 A. No, I do not agree. The schedule, as outlined by the FCC in the TRO, allows

12 sufficient time for any reasonable CLEC to plan and implement the necessary

13 collocation arrangements and other facilities needed to provide switching.

14 BellSouth should not be held accountable for poor planning on the part of a

15 CLEC who chooses to procrastinate and wait until the end of the 21-month

16 period to convert all of their UNE-Ps.

17

18 Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

19

20 A. Yes.

UNE-P to UNE-L Order Summary
October 9, 2003 - January 31, 2004

		Date	Volume	% DD Complete
October		10/9/2003	61	100.0%
	199	10/10/2003	91	100.0%
		10/16/2003	31	100.0%
		10/17/2003	2	100.0%
		10/21/2003	11	100.0%
		10/28/2003	2	100.0%
		10/29/2003	1	100.0%
November		11/4/2003	1	0.0%
	1977	11/5/2003	1	100.0%
		11/6/2003	85	98.8%
		11/7/2003	90	98.9%
		11/10/2003	70	100.0%
		11/11/2003	62	100.0%
		11/12/2003	62	100.0%
		11/13/2003	69	98.6%
		11/14/2003	16	100.0%
		11/17/2003	98	99.0%
		11/18/2003	136	98.5%
		11/19/2003	98	100.0%
		11/20/2003	375	99.7%
		11/21/2003	167	98.8%
		11/24/2003	434	99.3%
		11/25/2003	202	100.0%
		11/26/2003	11	100.0%
December		12/1/2003	140	100.0%
	3136	12/2/2003	319	99.4%
		12/3/2003	238	99.6%
		12/4/2003	114	98.2%
		12/5/2003	7	85.7%
		12/8/2003	23	95.7%
		12/10/2003	393	98.0%
		12/12/2003	85	100.0%
		12/15/2003	285	99.6%
		12/16/2003	3	66.7%
		12/17/2003	154	96.1%
		12/18/2003	9	100.0%
		12/19/2003	297	98.3%
		12/22/2003	642	98.9%
		12/23/2003	1	100.0%
		12/24/2003	415	98.6%
		12/26/2003	3	100.0%
		12/29/2003	8	100.0%

UNE-P to UNE-L Order Summary
October 9, 2003 - January 31, 2004

		Date	Volume	% DD Complete
January		1/2/2004	44	95.5%
	5469	1/5/2004	671	98.8%
		1/6/2004	4	100.0%
		1/7/2004	1022	95.6%
		1/8/2004	900	99.9%
		1/9/2004	516	98.3%
		1/12/2004	298	99.7%
		1/14/2004	195	99.0%
		1/15/2004	239	97.5%
		1/16/2004	20	95.0%
		1/19/2004	186	98.4%
		1/21/2004	211	100.0%
		1/22/2004	343	98.0%
		1/23/2004	398	99.0%
		1/28/2004	237	100.0%
		1/29/2004	185	100.0%